



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
NEW ENGLAND – REGION 1  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

September 20, 2013

Mr. Thor Helgason  
De Maximis  
135 Beaver Street  
Waltham, MA 02452

Re: Review of the *Evaluation of the Northeast Area Remedial Action*, prepared by Tetra Tech, dated February 25, 2013, W. R. Grace (Acton Plant) Superfund site, Acton & Concord, Massachusetts

Dear Thor,

EPA, in consultation with MassDEP, has reviewed the above referenced report and is providing conditional approval for shutdown of the Northeast treatment system. Our evaluation and conditional approval considered written comments we received from both the Town of Acton and the Acton Water District in April of 2013. We also took into account discussions that occurred in a meeting with the Town of Acton and others at our office, on August Aug 12th, 2013.

The 2005 Record of Decision (ROD) and the 2006 Remedial Design/Remedial Action Statement of Work required that a Northeast Area treatment system be constructed and operated to reduce the contaminant mass in the most concentrated portion of the Northeast Area plume. The ROD also anticipated that the treatment system would need to operate for three years or more in order to obtain the objectives described in the ROD. The ROD required the following objectives to be evaluated at the end of the three year period, to determine if the treatment system should continue to operate or be shut down.

The ROD objectives are as follows:

1. to protect the municipal water supply by reducing the areal extent of contamination;
2. reduce the mass of contamination in the most concentrated part of the plume;
3. minimize impacts to the School Street well field and Fort Pond Brook;
4. minimize impacts to residential property owners in the Northeast Area by locating remedial system components on industrial property or public lands where technically and administratively feasible.

We have reviewed these ROD-required objectives and supporting information and believe that shutdown of the system is appropriate. The following information supports that these conditions have been met:

- Concentrations of vinylidene chloride (VDC)(the main site-related contaminant) in the School Street Town Wells are currently below the Maximum Contaminant Level of 7 ppb, and have been since before the Northeast Area remedial system became operational;
- Approximately 1.4 pounds of total Volatile Organic Compounds (VOCs) was removed during the first month of system operation. After three years of operation, the VOC removal rate has decreased to only 0.3 pounds (removed during December 2012);
- A comparison of 2001 and 2012 data indicates that the residual mass of VDC in the most concentrated part of the plume since has significantly reduced since the system became operational. For example, in 2001, prior to start-up of the Northeast Area remedial system, VDC was detected in MW-06B at a concentration of 260 ug/L. After three years of operation, VDC concentrations in MW-06B decreased to 25 ug/L.
- Water level and extraction rate data collected by the Acton Water District for the three School Street public wells do not show any obvious impacts to yield or drawdown from operation of the Northeast Area remedial system, indicating that impacts to the School Street well field and Fort Pond Brook were minimal. *Tetra Tech, 2013*
- The Northeast Area treatment system was located and operated on an industrial property, the Linde Company, thereby minimizing impacts to residential property owners in the Northeast Area.

A copy of the original April 2013 comments from both the Town of Acton and the Acton Water District are included as an attachment to this letter. In order to address the remaining concerns from the Acton Water District and the Town of Acton, EPA is providing a **conditional approval** to shut down the Northeast Area System based on the following conditions:

1. The Northeast Area treatment system cannot be dismantled or removed until EPA and MassDEP review and provide comments on the 2014 annual groundwater monitoring report for the site. This would allow the system to easily re-started, in the unlikely event EPA and MassDEP determine that it becomes necessary to restart the system;
2. The 2013 annual groundwater sampling and elevation measurements must be completed prior to shutdown (it is our understanding from recent discussions that the annual groundwater event has already been completed);
3. The four individual wells that make up the Scribner town well must be sampled quarterly for at least a one-year period and analyzed for 1,4 dioxane. This is required in order to address 1,4 dioxane concerns from both the MassDEP Waste Site Cleanup and Drinking Water Programs, the Acton Water District, and the Town of Acton.
4. The results of these sampling events (i.e., the laboratory data sheets) must be provided to the Acton Water District and to the MassDEP Drinking Water Program as soon as the results are available or, at a minimum, within 10 days of the end of the quarterly monitoring period, in accordance with USEPA drinking water regulatory requirements. For example, for the samples collected from the Scribner wells on September 19, 2013, results



should be provided to the AWD and the MassDEP Drinking Water Program by October 10, 2013.

5. We understand that W. R. Grace has sampled the four individual Scriber wells on September 19, 2013. Once W. R. Grace confirms that they will perform three additional rounds of quarterly sampling for the Scribner well, the Northeast Area treatment system may be shut down.

If you have any questions, you may contact me at 617-918-1448.

Sincerely,

A handwritten signature in blue ink, appearing to read "Derrick Golden", with a long horizontal flourish extending to the right.

Derrick Golden  
Remedial Project Manager  
Office of Remediation and Restoration  
Environmental Protection Agency

cc: Bob Cianciarulo – EPA  
Gretchen Muench - EPA  
Jennifer McWeeney – MassDEP Boston Office  
Marielle Stone, MassDEP Central Regional Office – Drinking Water Program  
Barbara Weir – Metcalf & Eddy  
Chris Allen – Acton Water District  
Matt Mostoller – Acton Water District  
Doug Halley – Acton Board of Health  
Jane Cersaso  
ACES  
File – EPA